

UNITED STATES FEDERAL COURT
DISTRICT OF NEW JERSEY

Daniel M. Risis
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**CERTIFICATION OF DANIEL M. RISIS
EMERGENCY ORDER TO SHOW
CAUSE TO VACATE JUDGMENTS AGAINST
DANIEL M. RISIS AND ALL RELATED
COMPANIES THAT DANIEL M. RISIS
HAS ANY OWNERSHIP INTEREST IN**

Case No: 23-cv-03428
Judge: Salas

I, Daniel M. Risis, the Plaintiff in this matter, submit this Certification, in support of my Emergency Order to Show Cause TO VACATE JUDGEMENTS AGAINST DANIEL M. RISIS AND ALL RELATED COMPANIES THAT DANIEL M. RISIS HAS ANY OWNERSHIP INTEREST IN.

1. I have been a victim of fraud for over 4 years without anyone in the courts or law enforcement stepping in.
2. I, Daniel M. Risis, spent 1 year documenting and writing up this federal lawsuit in order to fully articulate the nature of what has happened.

3. My Lawsuit was filed over a month ago.
4. Not a single defendant or Counsel for any defendant has reached out.
5. PB Financing is a named Defendant in this lawsuit.
6. PB Financing only met me through my professional capacity as I represented my mothers company.
7. This was identical to the matter regarding Oleg Niezvestney.
8. Both Judgements are addressed in my lawsuit and both judgements are frivolous.
9. I do not own even 1% of Perfect Pawn (Daniel Markus Inc) and I never have. The sole owner of that company is my mother, Margarita Risis.
10. I have not received any of the benefits that come with co-signing the PB financing loan.
11. No terms of the loan agreement were followed by my mother.

12. This was done purposefully so that my mother dumps the entire debt onto me personally
13. I never received a penny of this money personally unless it was part of my compensation package or it was a form of debt repayment since I have lent my mothers company a lot of money before she took these loans out.
14. My Mother, Margarita Risis, is the principal and 100% owner of Daniel Markus inc. DBA Perfect Pawn yet the creditor refuses to accept that I was terminated and fooled into co-signing this debt.
15. There are risks associated with doing business. Neither PB Financing nor Oleg Niezvestney want to recognize the validity of the REAL owner of the company and both entities are trying to go after me personally since my mother is in hiding.
16. I have never once avoided any of my responsibilities and I have been more than cooperative.
17. As a direct Result of my actions, I have been punished by the legal system since I am pro-se defendant and plaintiff in a world that tries to hurt pro-se litigants due to the strong, long standing relationships between private attorneys and the courts.

18. These actions are in violation of the US Constitution laws of DUE PROCESS:

The Constitution states only one command twice. The Fifth Amendment says to the federal government that no one shall be "deprived of life, liberty or property without due process of law." The Fourteenth Amendment, ratified in 1868, uses the same eleven words, called the Due Process Clause, to describe a legal obligation of all states. These words have as their central promise an assurance that all levels of American government must operate within the law ("legality") and provide fair procedures.

19. It has become very clear to me that based on my Bankruptcy Filing, the attorneys for the Trustee, Donald Biase, Worked closely with the creditors in order to hurt me further in the background. This is in violation of all Chapter 7 Handbook rules and regulations.

20. All of this was ignored by Judge Sherwood and the court of law.

21. I know for a fact this Federal Court will not ignore the State's Courts lack of awareness for the real time, updated facts of this case.

22. At NO TIME am I doubting the validity of PB financing claim or Oleg Niezvetseny's claims against Margarita Risis and Perfect Pawn.

23. What I am stating to the courts is that I, Daniel M. Risis, have new information that I did not have at the time of these two judgements.

24. I have information that shows that the bookkeeper, At the time of both transactions was Vickianna Colon and her entire interactions with my mother need to be examined given the fraud she is accused of.

25. My Mother, Margarita Risis, benefited greatly with an enriched lifestyle and over 2 decades of luxury for doing nothing more than giving birth to me.

26. I cant keep saying the same exact thing so please give me a chance to give you some case law.

27. The PB Financing judgment is from Colorado. I am a Citizen of New Jersey. I was never able to represent myself personally since I worked with counsel to present my mothers company.

28. PB financing is "piercing" a fictitious corporate veil since the debt was solely for Daniel Markus inc. DBA Perfect Pawn yet I am personally held liable for all of my mother's misdeeds.

29. I have countless reasons as well as 5 reasons for a meritorious defense to this action: 1: I do not own the company nor have I ever. 2: My Mother robbed her own company and by default destroyed the loan collateral. 3: The criminal activity of the other actors in this case is coming into public light. 4: My mother currently works with the man, Bryan Lustig through my cousin David Bogomolny at his location in Greenbrook NJ labeled "Great Stuff Pawn".

5: I am a victim of Fraud and Theft By deception and require law enforcement assistance.

30. There is a Federal Rule **6.01 (2) (Restatement of Agency)** which clearly states **that the following: The Restatement (Third) of the Law of Agency ("Restatement of Agency") § 6.01(2) provides the general rule that an agent (here the Actor) is not a party to – and thus is not liable to – a third party on a contract between a fully-disclosed principal (here, the LLC) and a third party, even if the agent, in its representative capacity as such negotiates and performs the contract.**

31. I am a human being who was used and discarded in order to obtain fraudulent loans which then were mismanaged by my mother.

32. For Oleg Niezvestney, my mother and Oleg ran a complex money laundering operation under my nose and no matter how many times I asked Oleg Niezvestney for receipts, I realized in his deposition that he never declared any of our transactions with the government hence he states that "I never gave the business cash" which is a bold faced lie.

33. Two Judgements. That's what my professional life has come to. There are other small judgements that mirror these two but both these judgements should be vacated on lack of Jurisdiction and Improper venue, as well as the new information about the criminal activities in the background which is now public.

34. I also want to remind the courts that I was fully ignored when I raised this issue up to the Bankruptcy court and this entire claim was ignored by the trustee and I lost out on tens of millions of dollars in favor of a liquidation. There was a major issue in my case since I didn't file to liquidate but to adjudicate my claims which far outweigh my debts.

35. I already filed for 3 corporate bankruptcies which all failed yet the Trustees plan, which was worse than mine was approved in favor of stripping me of my assets.

36. PB financing worked closely with the trustee and has filed their motions in a timely manner to distract the federal courts as to the reality of their debt.

37. There are so many matters that are criminal it is virtually impossible to keep track since the criminals are highly sophisticated and well funded so they can blind the courts eyes.

38. By virtue of example, Oleg Niezvestney already has a felony for Racketeering and money laundering (to the best of my knowledge) and he has committed both one again in conjunction with this "judgment" he has against me personally.

39. PB Financing is in Violation of 15 U.S.C. §§ 1601-1667f, as amended which in short is the "truth in lending act" by way of their actions towards me, the co-debtor and not the principal.

40. Margarita Risis liquidated her home of 30 years prior to absconding and being non-responsive.

41. I have not once avoided or not responded or assisted with all matters of the court.

42. I am forever punished for this action since time after time, my honesty and transparency with the courts has resulted in multiple orders being put against me for creditors to get paid without any rights to do so.

43. At no time was I ever made aware of my mother (Margarita Risis) intentions to defraud her own company or I never would have worked for her let alone defend her in court that resulted in judgments against me personally.

44. I am a victim of circumstance and the creditors are taking full advantage of the quantity of frivolous litigation I am party to

45. As I stand before this court, my allegations against these defendants are all true and if I do not get emergency relief the damage is irreparable. It will be

permanent financial, legal, professional, personal and mental damage to me,
Daniel M. Risis.

I certify that the following statements by me are true and correct to the best of my
knowledge.



Daniel M. Risis

Dated: 8/2/23